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**REDACTED - PUBLIC VERSION**

The Honorable Vincent J. Poppiti  
BLANK ROME LLP  
Chase Manhattan Center  
1201 Market Street, Suite 800  
Wilmington, DE 19801

Re: *LG.Philips LCD Co., Ltd. v. ViewSonic et al., C.A. No. 04-343-JJF*

Dear Special Master Poppiti:

LPL's motion to compel production of assembly instructions is based entirely on a misrepresentation of the record and reflects an inadequate review of the Tatung Defendants' document productions.

LPL attaches the July 11, 2007 email from Cormac Connor to Valerie Ho requesting the production of assembly instructions discussed in Vincent Liu's deposition (Exhibit B to LPL's motion), but fails to mention anywhere in the motion or Rule 7.1.1 certification that the Tatung Defendants' counsel, including Ms. Ho, actually met and conferred with Mr. Connor on July 12, 2007, the day after Mr. Connor sent his email. During that meet and confer, LPL was informed that Tatung already had produced all of the assembly instructions for the accused products that it could locate after performing a diligent search. LPL omitted any mention of the parties' actual meet and confer in order to create the impression that its request for assembly instructions was ignored by the Tatung Defendants (when it was not), thereby manufacturing a false basis for this motion.

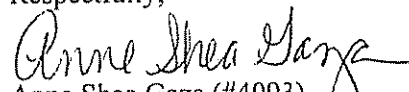
Had LPL bothered to conduct even a cursory review of the Tatung Defendants' document productions, it would have noticed the documents entitled "ASSEMBLY INSTRUCTIONS." In fact, Tatung produced close to 1000 pages of assembly instructions relating to the accused products. Attached as Exhibits A and B hereto are two examples of the assembly instructions produced by Tatung. Instead of diligently reviewing the productions, LPL has engaged in a practice of making inaccurate claims that documents have not been produced and sending harassing letters to the Tatung Defendants.

Moreover, LPL has failed to provide even a cursory explanation for why the assembly instructions are even relevant at this juncture. LPL has never suggested that the exploded view diagrams and CAD/CAM drawings produced by Tatung are insufficient for its purposes, and in

fact, has accused a number of products based exclusively on the drawings provided (even though it subsequently confirmed that many of those allegations will be withdrawn if the Special Master's claim constructions are adopted).

Accordingly, LPL's motion has no merit, is harassing, and should be denied as moot.

Respectfully,

  
Anne Shea Gaza (#4093)

ASG/afg

Enclosures

cc: Clerk of the Court (By Electronic Filing)  
All Counsel of Record (via electronic mail)